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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

Plaintiff,

V.

DAMASO LOPEZ-SERRANO.

Defendant.

Case No. 16-CR-1896-DMS

JOINT MOTION FOR PROTECTIVE ORDER

The parties, United States of America, by and through its counsel Alana W. Robinson, Acting United States Attorney, and Adam L. Braverman, Assistant United States Attorney, and the above-captioned defendant, through his attorney, hereby jointly move pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure for this Court to enter a Protective Order pertaining to pretrial discovery, and to prevent premature disclosure of evidence to other targets, subjects, and witnesses of ongoing investigations. The parties jointly agree to the following:

(1) That the defendant, counsel of record, and the counsel's assistants, as hereafter defined, shall not disclose the substance of any discovery material received from the

1 United States in the above-captioned matter, to any third party, unless such material is  
2 already a matter of public record, without prior approval of this Court;

3 (2) That the United States Attorney and the Assistant United States Attorney  
4 assigned to this case (hereafter collectively referred to as “the United States”) and their  
5 assistants, the defendant, counsel and assistants, shall not disclose the substance of any  
6 discovery material produced to the defendant or obtained by the United States from the  
7 defendant, unless such material is already a matter of public record, to representatives of  
8 the media or other third parties not involved in the investigation or prosecution of the  
9 case.

10 (3) Nothing contained herein shall prevent the United States, or any defendant or  
11 their counsel, from disclosing such discovery material to any other attorneys working  
12 for the United States, the defendant or counsel, government agents (federal, state or  
13 local), private investigators, experts, secretaries, law clerks, paralegals, or any other  
14 person who is working for the United States or the defendants and their counsel  
15 (collectively referred to as “assistants”) in the investigation or preparation of this case  
16 or, with respect to the United States and its assistants only, in other criminal  
17 investigations, without prior court order.

18 (4) Further, nothing contained herein shall preclude the United States, the  
19 defendant or counsel, or the respective assistants from conducting a normal investigation  
20 of the facts of this case on behalf of the United States or the defendant, or with respect  
21 to the United States and its assistants only, from conducting an investigation of other  
22 criminal activity, including interviewing witnesses disclosed by discovery materials, or  
23 from taking statements from witnesses disclosed by discovery materials, or from asking  
24 witnesses if they themselves have made prior statements to the United States that are  
25 disclosed in the discovery materials, and about the contents of such statements. In  
26 connection with any such investigation, it shall not be necessary that the United States,  
27 the defendant or his counsel, or the respective assistants, obtain prior permission of the

1 Court.

2 (5) Should counsel withdraw or be disqualified from participation in this case, any  
3 material received and any copies derived therefrom, shall be returned to the United States  
4 within ten (10) days or, if agreed to by the parties, to replacement counsel.

5 (6) Defense counsel and the United States shall be required to communicate the  
6 substance of this order and explain it to their clients and assistants before disclosing the  
7 substance of the discovery to their clients or assistants.

8  
9 DATED: August 15, 2017.

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11 Respectfully Submitted,

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13 ALANA W. ROBINSON  
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15 Acting United States Attorney

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17 s/ Adam L. Braverman  
18 ADAM L. BRAVERMAN  
19 Assistant United States Attorney

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21 s/ Michael Littman  
22 MICHAEL LITTMAN  
23 Attorney for the Defendant

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

V.

DAMASO LOPEZ-SERRANO,

## Defendant.

**Case No. 16-CR-1896-DMS**

## CERTIFICATE OF SERVICE

12 | IT IS HEREBY CERTIFIED THAT:

13 I, ADAM L. BRAVERMAN, am a citizen of the United States and am at least  
14 eighteen years of age. My business address is 880 Front Street, Room 6293, San Diego,  
California 92101-8893.

15 I am not a party to the above-entitled action. I have caused service of **JOINT**  
16 **MOTION FOR PROTECTIVE ORDER** on the following parties by electronically  
filing the foregoing with the Clerk of the District Court using its ECF System, which  
electronically notifies them.

## 1. Michael Littman, Esq.

I hereby certify that I have caused to be mailed the foregoing, by the United States Postal Service, to the following non-ECF participants on this case:

1. None

the last known address, at which place there is delivery service of mail from the United States Postal Service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 15, 2017

s/ Adam L. Braverman  
**ADAM L. BRAVERMAN**